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NORTH CAROLINA COMMUNITY COLLEGE SYSTEM

H. Martin Lancaster, President

May 10, 2001

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Chairman Michael K. Powell
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

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Dear Mr. Chairman,

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

As President of the North Carolina Community College System, I respectfully ask that you preserve the ITFS frequencies for educational use. There are 59 colleges in our system, most of which have some kind of presence outside of their main campuses. This adds up to a presence in each of the 100 counties in the state. Thirty-nine of our colleges are involved in the ITFS Project whereby 26 either have licenses or have applications pending for the full four channel configuration and 13 are sharing channels with sister institutions.

During the almost six years of this Project, hundreds of people have invested thousands of hours dedicated to bringing wireless broadband service to all our college sites. Bellow is a partial listing of what this investment of time money has accomplished.

1. We negotiated a contract with Wireless One of North Carolina [WONC] based in large part on our mutual goal of construction a statewide wireless network. WONC is a partnership between CT Communications of Concord, N. C. and WorldCom. The partnership has been on a 50%- 50%, but CT Communications is in the process of acquiring a majority interest. We believe that this is a very advantageous arrangement. Being a "home grown" company, CT Communications' self interests largely coincide with the interests of the Community College System and the state as a whole. WorldCom brings needed capital and economies of scale regarding equipment.
2. We have formed the Wireless Communications Consortium that is made up of the presidents of all 39 colleges involved in the ITFS Project. The Consortium worked out channel sharing agreements.

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It is empowered to re-negotiate the contracts made necessary by the change from television to broadband wireless connectivity to the Internet. Although WONC's business plan essentially covers the entire state, there are dark spots or gaps in the network. The Consortium is dedicated to filling in the gaps in the ITFS system with equipment utilizing unlicensed frequencies so that all 59 institutions will be included.

3. We have formed a system wide organization called the Virtual Learning Community [VLC] to furnish the course ware for the ITFS network. The VLC has already produced 60 courses that are being carried on our crowded terrestrial T-1 network.
4. We have formed a Distance Learning Council to oversee the educational, legal, policy, and business issues regarding the ITFS network and all other electronic means of distributing education and training.
5. Each of the 39 colleges has developed an ITFS Utilization Plan.

The Commission has shown great patience in the face of the disappointingly slow development of the ITFS frequencies. The slow pace has been because the educational community is chronically under-funded and has not had the capital to develop ITFS. The permission to establish private sector partnership has now made our ITFS Project feasible. I hope that the Commission will stay the course and not reallocate any of the ITFS frequencies. Reallocation of any part of the ITFS spectrum would make WONC's business plan and the North Carolina Community College System's educational plan problematic at best and probably impossible.

Finally, we see the wireless broadband service that ITFS can deliver as an important means of overcoming the digital divide and improving rural equity. There are really two North Carolinas. The urban and suburban areas are growing and generally prosperous. The rural areas are declining and struggling.

As one of my staff has said: "The FCC, WONC, and our Community College System have already run the 26 miles of and largely uphill marathon. Now, we simply must find the strength and courage to run the remaining 385 years."

With kindest regards, I am

Sincerely,



H. Martin Lancaster

HML:jtb